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11 *Attorneys for Defendant Bristol-Myers Squibb Company*

12 [Additional Counsel Listed At Signature Page]

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 JAMES BLAIR *et al.*,

18 Plaintiff,

No. 14-2515 EMC

19 v.

20 BRISTOL-MYERS SQUIBB COMPANY,
MCKESSON CORPORATION, and
21 DOES 1 to 100,

JOINT STIPULATION AND
~~[PROPOSED]~~ ORDER TO STAY
LITIGATION PENDING TRANSFER TO
THE PLAVIX® MDL

22 Defendants.

Judge: Hon. Edward M. Chen

1 This Joint Stipulation is made by and between Plaintiffs in *Blair et al. v. Bristol-Myers*
2 *Squibb Co. et al.*, No. CV-14-2515 EMC (N.D. Cal.), and Defendant Bristol-Myers Squibb
3 Company (“BMS”) (collectively “the Parties”), by and through the undersigned counsel of record,
4 with reference to the following facts:

5 1. WHEREAS, on February 12, 2013, the Judicial Panel on Multidistrict Litigation
6 (“JPML”) established a multidistrict Plavix® litigation in the District of New Jersey, assigned to
7 Judge Freda Wolfson;

8 2. WHEREAS, on May 30, 2014, Plaintiffs filed the *Blair* action in the Superior Court
9 of California, San Francisco County;

10 3. WHEREAS, on June 2, 2014, the *Blair* action was removed to this Court by
11 Defendant BMS;

12 4. WHEREAS, on June 11, 2014, Defendant BMS tagged this case for transfer to the
13 Plavix® MDL and anticipates that the JPML will issue a conditional transfer order for this case
14 soon; and

15 5. WHEREAS, the parties agree that the *Blair* action should be stayed pending its
16 anticipated transfer to the Plavix® MDL in the District of New Jersey.

17
18 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s
19 approval, that the *Blair* action should be stayed pending its anticipated transfer to the Plavix® MDL
20 in the District of New Jersey.

21
22 **IT IS SO STIPULATED.**

1
2 Dated: June 11, 2014

3
4 Joshua C. Ezrin
5 AUDET & PARTNERS, LLP
6 221 Main Street, Suite 1460
7 San Francisco, CA 94105

8
9 Daniel C. Burke
10 PARKER WAICHMAN LLP
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12 Port Washington, New York 11050

13 By: /s/ Joshua C. Ezrin
14 Joshua C. Ezrin

15
16 *Attorney for Plaintiffs*

17 Dated: June 11, 2014

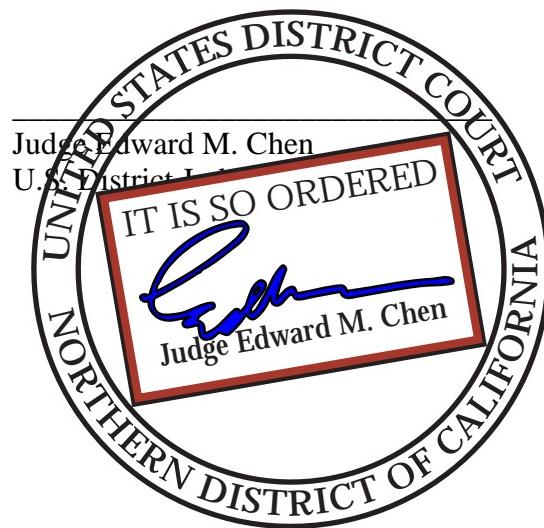
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21 By: /s/ Sharon D. Mayo
22 Sharon D. Mayo

23
24 *Attorney for Defendant*
25 *Bristol-Myers Squibb Company*

26
27
28 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

29 Date: 6/13/14



1 I, Sharon D. Mayo, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order to Stay Litigation Pending Transfer to the Plavix® MDL. In
3 compliance with General Order 45, X.B, I hereby attest that Joshua C. Ezrin has concurred in this
4 filing.

5
6 Dated: June 11, 2014

ARNOLD & PORTER LLP

7
8 By: /s/ *Sharon D. Mayo*
9 Sharon D. Mayo

10 *Attorney for Defendant*
11 *Bristol-Myers Squibb Company*